



Association Mondiale des Producteurs d'Extraits d'Algues Marines
World Association of Seaweed Processors

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Dear Mr. Neal:

Subject: Docket Number: TM-04-07
7 CFR 205

Marinalg International is a trade association representing worldwide producers of seaweed derived hydrocolloids. We support the continued listing of carrageenan, alginic acid and agar-agar in 7 CFR 205.605(a) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s))” – nonsynthetics. We support also the continued listing of alginates which presently are provided for in 7 CFR 205.605(b) - Nonagricultural (non-organic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic (specified ingredients or food group(s))” – synthetics.

Seaweed derived hydrocolloids have a long history of use in food. They are biodegradable.

By way of elaboration:

Carrageenan

Carrageenan is extracted from red seaweed. Carrageenan provides the following properties when used in food.

- Its gelling properties are unique
- It provides for a range of viscosities
- It creates a viscosifying suspension
- It controls syneresis
- There is unique interaction between carrageenan and protein

- It provides an indulgent property (i.e. rich mouthfeel in reduced fat products)
- It is a cost effective stabilizer that is used at low levels
- It provides long term shelf stability for food products
- It is used at low use levels and it does not mask flavor
- It is considered a soluble fiber
- It provides film forming properties
- It's viscous properties provide dosage control in delivery of vitamins and minerals in nutritional beverages

Some examples of the types of products in which carrageenan is used are: frozen dairy desserts, chocolate milk, puddings, custards, dessert jells, syrups, relishes, whipped toppings, non-dairy beverages, confections, meats and infant formula.

Alginic Acid

Alginic acid is extracted from brown seaweed. It is used as an emulsifier, formulation aid, stabilizer or thickener for example in soup and soup mixes, tea mixes, instant noodles, biscuits etc.

Agar-agar

Agar is extracted from seaweed. Its main applications in the food industry are baked goods, sweetened jellies, meat products sauces and fillings.

Alginates

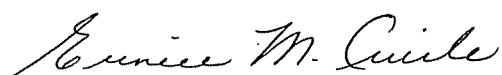
Alginates are salts of alginic acid. They are used to stabilize and thicken foods. They can hydrate at cold temperatures, form freeze thaw stable gels and heat stable gels.

Some examples of the types of food in which alginates are used are sauces (i.e. dry mix), dairy based beverages, low fat spreads. Alginates provide bake stability of fillings in baked goods. It is used in the production of restructured foods such as chunk style pet foods, fruits, onion rings and pimentos used in stuffed olives.

Each of the above mentioned ingredients is unique in its functionality. They cannot be used interchangeably nor can they be substituted by other listed ingredients.

We appreciate this opportunity to comment. Please feel free to contact us if you need additional information about these products.

Sincerely,



Eunice M. Cuirle
Chairman – Marinalg Technical and Regulatory Committee

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